Customer No.: 00909
Application Serial No.: 10/840,216
Attorney Docket No. 070826-0317250
Response to Office Action mailed September 12, 2006

## REMARKS

Upon entry of the foregoing Amendment, claims 1-23 are pending in the application. Claims 1-3, 5-9, 12-20 and 22 have been amended; no claims are canceled; and new claim 23 is added. Applicants believe that this Amendment does not add new matter. In view of the foregoing Amendment and following Remarks, allowance of all the pending claims is requested.

#### Examiner Interview

Applicants thank Examiner Diaz for granting Applicants' representative the courtesies of an Examiner Interview on February 26, 2007. During the Examiner Interview, the Applicants discussed the failure of Barton to disclose, teach or suggest the features of claim 1 prior to the foregoing Amendment. In particular, Applicants demonstrated that Barton is silent with regard to elements that are subject to the processes. Furthermore, Applicants demonstrated that the features of claim 15<sup>1</sup> which include the feature of:

wherein displaying comprises mapping the plurality of processes against the collection of elements in a matrix, listing the actor at an intersection of the associated process and element within the matrix, and displaying the populated matrix

are not disclosed, taught or suggested by Barton.

#### Rejection Under 35 U.S.C. § 112

The Examiner has rejected claims 20-22 under 35 U.S.C. § 112, second paragraph, as allegedly being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention. Applicants have amended claim 20 to further clarify that which Applicants regard as the invention thereby rendering this rejection moot.

<sup>&</sup>lt;sup>1</sup> Claim 15 has been rewritten in independent form by the foregoing Amendment.

### Rejection Under 35 U.S.C. § 102

The Examiner has rejected claims 1-7 and 12 under 35 U.S.C. § 102(a) as allegedly being anticipated by U.S. Patent Publication No. 2002/0059093 to Barton et al. ("Barton"). Applicants traverse this rejection because, as discussed during the Examiner Interview, Barton does not disclose each and every feature of claim 1, for example.

Nonetheless, solely in an effort to expedite prosecution of this matter, Applicants have amended claim 1, to include features similar to those recited in claim 15.

As discussed during the Examiner Interview, Barton does not disclose at least the features of:

mapping each of the plurality of processes and said at least one element that is subject to the respective process against one another, and populating an intersection of at least one of said mapped process and mapped element in the matrix with said actor that is responsible for completing said mapped process with said mapped element

as now recited in claim 1.

Barton apparently discloses mapping processes against actors (see e.g., Fig. 4) rather than mapping processes against elements subject to those processes as required by claim 1. Furthermore, Barton apparently discloses populating the intersections of a matrix with an indicator that identifies the relationship between the process and actor rather than populating the intersections of the matrix with an actor that is responsible for completing the process with the element. For at least this reason, Barton fails to disclose all the features of the claimed invention. Accordingly, the rejection of claim 1 is improper and must be withdrawn.

Claims 2-7 and 12 depend from and add features to claim 1. Hence, the rejections of these dependant claims are likewise improper and must be withdrawn for at least the reasons set forth above with regard to claim 1.

### Rejection Under 35 U.S.C. § 103

The Examiner has rejected claims 8, 9 and 13-22 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Barton. Applicants traverse this rejection because Barton does not teach or suggest all the features of the claimed invention.

Claim 14 and dependant claim 22 recite features similar to those discussed above with regard to claim 1. Hence, the rejections of these claims are improper and must be withdrawn for at least the reasons set forth above with regard to claim 1. Claims 16-19 depend from and add features to claim 14. Hence, the rejections of these dependant claims are likewise improper and must be withdrawn for at least the reasons set forth above with regard to claim 1.

Claim 15, which has been written in independent form, includes features prior to the Amendment that were not otherwise disclosed, taught or suggested by Barton as discussed above. Hence, the rejection of claim 15 is improper and must be withdrawn.

Claim 20 recites the features of:

displaying, for each process, the one or more elements subject to the process;

displaying, for each process, an actor responsible for completing the process with the one or more elements subject to the process....

Barton apparently teaches displaying processes and the actors that perform those processes. (See e.g., Fig. 4). Barton does not teach or suggest "displaying ... one or more elements subject to the process." In fact, Barton is silent with regard to displaying elements. As a result of this deficiency, Barton also does not teach or suggest "displaying ... an actor responsible for completing the process with the one or more elements subject to the process." For at least this reason, Barton fails to teach or suggest all the features of the claimed invention. Accordingly, the rejection of claim 20 is improper and must be withdrawn.

Claim 21 (as well as claim 22 which is addressed separately above) and new claim 23 depend from and add features to claim 20. Hence, the rejections of these dependant claims are improper and must be withdrawn for at least the reasons set forth above with regard to claim 20.

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# CONCLUSION

Having addressed each of the foregoing rejections, it is respectfully submitted that a full and complete response has been made to the outstanding Office Action and, as such, the application is in condition for allowance. Notice to that effect is respectfully requested.

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Date: March 12, 2007 Respectfully submitted,

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